



STATE OF WASHINGTON  
**HEALTH CARE AUTHORITY**

626 8th Avenue, SE • P.O. Box 45502 • Olympia, Washington 98504-5502

September 30, 2011

Rebecca Burch Mack, Technical Director  
Division of State Demonstrations and Waivers  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard, MS S2-01-16  
Baltimore, MD 21244-1850

Dear Ms. Burch-Mack:

**SUBJECT: Resubmission of Family Planning Demonstration Waiver for TAKE CHARGE**

Enclosed is Washington State's resubmission of our Family Planning Demonstration Waiver for TAKE CHARGE.

There are some changes to this resubmission from the original submission in December 2008. Legislation directed the Health Care Authority (HCA) to request many of the following changes:

**Increase to 250% of the Federal Poverty Level (FPL):** State law requires us to request the FPL be raised from 200% to 250% to correspond with income eligibility for publicly funded maternity services. The Health Care Authority supports this language in the legislation.

**Insurance Coverage and Waiver Participants:** State law requires us to request the language that bars clients with creditable insurance from applying for TAKE CHARGE be dropped. The Health Care Authority would like to enroll men and women with primary insurance, who are otherwise eligible, like any other Medicaid client. We will require providers to bill the client's primary insurance first and the state will cover the balance, saving both state and federal dollars. There would continue be an exception for "Good Cause" for minors requesting confidential services, and for clients in domestic violence situations who are covered under the perpetrator's insurance. The Health Care Authority supports this language in the legislation.

**Proof of Citizenship:** State law requires that we request a return to the application process of the first five years of the Waiver and allow applicants to declare their citizenship and sign a *Citizenship Documentation and Identity Declaration* that they are United States citizens. The Health Care Authority supports this language in the legislation.

**Social Security number:** State law requests that the Agency ask CMS waive the requirement for applicants to provide a Social Security number (SSN). We request a return to the eligibility standards of the original waiver when clients were *strongly encouraged* to provide their SSN. In the first five years of the waiver, over 95% of clients supplied their SSN. The remaining applicants

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were primarily young teens with serious concerns about confidentiality. The Health Care Authority supports this change.

**Verifying Income of Minors:** The Health Care Authority requests CMS waive the Medicaid rule requiring us to verify income of all minors who apply for TAKE CHARGE. That step in processing applications is time and labor intensive. In ten years of administering the Waiver, we found only one teenager who was over-income. As we move the income eligibility to 250% of the FPL, it will be even less probable that we would ever have a minor apply who is over the income limit.

**Signature Date of Application:** The Health Care Authority requests CMS waive the Medicaid rule requiring us to use the date of submission to our office rather than the date of signature on the application. Most family planning clinics provide some services on the day of application. For clients applying in the last five working days of the month, there is a risk their application will not be submitted in time for eligibility during the month the application was signed, especially at clinics with evening and weekend hours.

**STD Testing and Treatment:** State law requires us to request coverage for STD testing and diagnosis under the Waiver renewal. While we recognize the important relationship between family planning and STD treatment and diagnosis, there is an enormous unmet need for STD services in Washington State. The Health Care Authority is concerned that by opening up this coverage we will become the default STD program in the State. We want to continue to cover GC and CT testing for women between the ages of 13 and 25 at the time of their annual family planning preventative exam. At this time, the State cannot afford to expand STD testing and treatment any further.

We look forward to our discussion with you as we move forward together to continue the TAKE CHARGE Waiver in Washington State.

Sincerely,



Doug Porter  
Director

Enclosure

cc: Preston W. Cody, Assistant Director, Division of Health Care Services, HCA  
Todd Slettvet, Section Manager, Office of Community Services, DHS, HCA  
Maureen Considine, Program Manager, OCS, DHS, HCA  
Janice Adams, Health Insurance Specialist, CMS Region X  
Maria Garza, Health Insurance Specialist, CMS Region X  
Angela Garner, Technical Director, CMS